

AO 91 (Rev. 02/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States District Court  
Southern District of Texas  
FILED

JAN 25 2019

David J. Bradley, Clerk

United States of America )

v. )

Juan Carlos MENDEZ )

COB: USA )

DOB: 04/19/1980 )

Defendant

Case No. 19-0180-M

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 01/24/2019 in the county of Hidalgo in the Southern District ofTexas, the defendant violated 8 U. S. C. § 1324

, an offense described as follows:

Knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation;

This criminal complaint is based on these facts:

See Attachment "A"

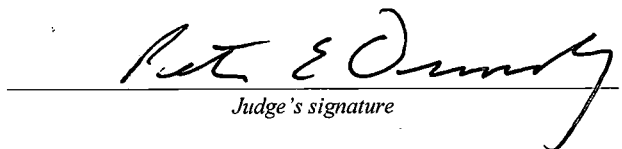
☒ Continued on the attached sheet.

Complainant's signature

Rolando Nino, Task Force Officer (HSI)

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/25/20194:50 pm

Judge's signature

City and state: McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge

Printed name and title

## **ATTACHMENT A**

On January 19, 2017 Homeland Security Investigations McAllen (HSI McAllen) Office, received information regarding an active stash house in Mission, Texas.

On January 24, 2019, HSI McAllen along with Field Intelligence Team (FIT), Specialized Targeting Investigation and Narcotics Group (STING), and the Hidalgo County Constables Office (HCCO) Pct. 4, approached the residence to gain consent to search from the owner or renter.

Upon arrival at the residence, and agents approached four subjects were observed running away. The four subjects were immediately apprehended by agents in the back yard without incident and identified as undocumented aliens (UDA's). Moments later, nine subjects exited the residence through the back door, who also admitted to being UDA's. A total of 13 UDAs was taken into custody and transported to border patrol station for interview and processing.

Agents were able to obtain two material witnesses; Mario RUIZ-Sanchez and Martin GARCIA-Rodriguez told agents that the smuggled aliens were citizens of Mexico, Honduras, Guatemala and El Salvador with no legal status to be in the United States.

RUIZ and GARCIA said they were in different smuggling groups, who had arranged to be smuggled illegally into the United States with unknown smugglers in Mexico. RUIZ stated that he was to pay a total of \$6,000.00 USD to be smuggled to the state of Tennessee. GARCIA stated he was to pay a total of \$8,000.00 USD to be smuggled to Houston, Texas. RUIZ and GARCIA positively identified Juan Carlos Mendez Sr. AKA "Charlie" from a photo lineup as the caretaker of the UDA's, who would also bring food to the UDA's. RUIZ stated that Mendez would tell the UDA's that they could not go outside and to not make a lot of noise. RUIZ also stated that Mendez advised RUIZ to give him \$180.00 USD so he can purchase a cell phone, which would be issued to him to be later use to circumvent the checkpoint. GARCIA also said that Mendez was the person who transported him to the house after his illegal entry into the United States.